

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TRICORE, INC.	:	CIVIL ACTION NO.
	:	04-12393 (JGD)
VS.	:	
SAFECO INSURANCE COMPANY OF	:	
AMERICA and R.P. IANNUCCILLO &	:	
SONS CONSTRUCTION CO.	:	JANUARY 31, 2006

**DEFENDANT SAFECO INSURANCE COMPANY OF AMERICA'S
CONSENTED TO MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO CROSS CLAIM PLAINTIFF'S MOTION FOR LEAVE TO AMEND**

Pursuant to Rule 7.1 of the Local Rules of the United States District Court for the District of Massachusetts, the cross-claim defendant, Safeco Insurance Company of America (the "Surety") moves, with consent, for an extension of time, up to and including February 20, 2006, to file the Surety's Response to the Motion to Amend filed by the defendant and cross-claim plaintiff, R.P. Iannnaccillo & Sons, Inc. ("RPI"). Counsel for RPI has consented to the relief sought in the Motion. In support of the Motion, the Surety states as follows:

Given the scope and nature of the arguments raised in RPI's Motion to Amend, the Surety seeks additional time, up to and including February 20, 2006, so that it can fully evaluate and rebut the arguments raised in the Motion to Amend. Because of the breadth of those arguments, additional time is required to compete this briefing.

WHEREFORE, the Surety respectfully requests up to and including February 20, 2006 to file its response to RPI's Motion to Amend.

CROSSCLAIM DEFENDANT,
SAFECO INSURANCE COMPANY
OF AMERICA

By

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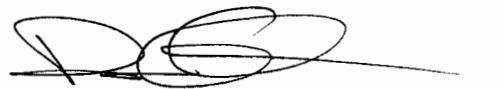
CERTIFICATION

This is to certify that on January 31, 2006, a copy of the foregoing was mailed, postage pre-paid or delivered electronically or by facsimile to the following:

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